

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JENNIFER DUNCAN,

Plaintiff,

v.

**JAMES “CHRIS” FREEMAN, ERIN
FREEMAN, and GOOD VAPES LLC
d/b/a GOOD VAPES,**

Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:14-cv-01827-G

PLAINTIFF’S MOTION TO REMAND TO STATE COURT

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff Jennifer Duncan (“Duncan”) and pursuant to the Federal Rules of Civil Procedure and the Local Rules for the U.S. Northern District of Texas, files this her Motion to Remand to State Court, seeking a remand of this case to the 44th Judicial District Court of Dallas County, Texas. The grounds for this Motion to Remand are set forth in the accompanying Brief, which is incorporated herein by reference. Duncan respectfully requests that the Court grant her Motion to Remand to State Court, remand this case to the 44th Judicial District Court of Dallas County, Texas, award Duncan her reasonable attorneys’ fees and costs, and grant Duncan such other and further relief to which she may be justly entitled.

Respectfully submitted, this 17th day of June, 2014.

Respectfully submitted,

/s/ Jason H. Friedman

Lawrence J. Friedman

State Bar No. 07469300

lfriedman@fflawoffice.com

Ernest Leonard

State Bar No. 12208750

eleonard@fflawoffice.com

Jason H. Friedman

State Bar No. 24059784

jhfriedman@fflawoffice.com

FRIEDMAN & FEIGER, L.L.P.

5301 Spring Valley Road, Suite 200

Dallas, Texas 75254

(972) 788-1400 (Telephone)

(972) 788-2667 (Facsimile)

ATTORNEYS PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2014, I electronically filed the foregoing **Brief in Support of Plaintiff's Motion to Remand to State Court** with the clerk of the court for the U.S. District Court, Northern District of Texas, Dallas Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Jason H. Friedman

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for Defendants in the above cause in an attempt to reach an agreement concerning the relief requested herein and Counsel for the Defendants is opposed to the relief sought herein. Therefore, this Motion is submitted to the Court for determination

/s/ Jason H. Friedman